

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

)
Minnesota Chamber of Commerce, a)
<i>Minnesota nonprofit corporation,</i>)
)
Plaintiff,)
)
vs.)
)
John Choi, in his official capacity as)
County Attorney for Ramsey County,)
Minnesota; George Soule, in his official)
capacity as Chair of the Minnesota)
Campaign Finance and Public Disclosure)
Board; David Asp, in his official capacity)
as Vice Chair of the Minnesota Campaign)
Finance and Public Disclosure Board;)
Carol Flynn, in her official capacity as)
Member of the Minnesota Campaign)
Finance and Public Disclosure Board;)
Margaret Leppik, in her official capacity)
as Member of the Minnesota Campaign)
Finance and Public Disclosure Board;)
Stephen Swanson, in his official capacity)
as Member of the Minnesota Campaign)
Finance and Public Disclosure Board; and)
Faris Rashid, in his official capacity as)
Member of the Minnesota Campaign)
Finance and Public Disclosure Board,)
)
Defendants)
)

Case No.: 0:23-cv-02015

**DECLARATION OF CIANNA G.
HALLORAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEY'S FEES AND
EXPENSES**

I, Cianna G. Halloran, hereby declare:

1. I am an attorney with the law firm of Winthrop & Weinstine, P.A., and I am one of the attorneys of record for Plaintiff Minnesota Chamber of Commerce (“Chamber”) in the above-captioned matter.

2. I have reviewed the time entries identified by State Defendants that purport to relate to the legal services rendered for the Chamber in working with the declarants in these proceedings. Based on that review, I have ascertained that some portions of those entries were not spent on working with the declarants, but instead relate to other work done for the Chamber in this action. I have provided the amount of time from those entries estimated to have been spent working with the declarants developing evidence to respond to Defendants' discovery and support the Chamber's claims in the third column below:

Entry Date	State Defendants' Suggested Reduction Amount	Chamber's Identification of Time Spent on Declarants
9/21/2023	\$1,785.00	\$875.00 (time of 2.5)
9/25/2023	\$735.00	\$175.00 (time of .5)
10/3/2023	\$105.00	\$105.00
10/9/2023	\$2,131.50	\$0.00 ³
10/10/2023	\$217.50	\$0.00 ¹
10/11/2023	\$280.00	\$35.00 (time of .1)
10/16/2023	\$315.00	\$70.00 (time of .2)
12/7/2023	\$1,015.00	\$105.00 (time of .3)
12/8/2023	\$2,170.00	\$805.00 (time of 2.3)
12/10/2023	\$595.00	\$70.00 (time of .2)
12/11/2023	\$1,917.00	\$284.00 (time of .4)
12/12/2023	\$630.00	\$630.00
12/12/2023	\$2,272.00	\$213.00 (time of .3)
12/19/2023	\$245.00	\$140.00 (time of .4)
12/20/2023	\$609.00	\$304.50 (time of .7)
12/20/2023	\$700.00	\$420.00 (time of 1.2)
12/21/2023	\$1,704.00	\$1065.00 (time of 1.5)
12/21/2023	\$1,225.00	\$770.00 (time of 2.2)
12/22/2023	\$1,633.00	\$1,278 (time of 1.8)
12/22/2023	\$1,120.00	\$560.00 (time of 1.6)
12/26/2023	\$639.00	\$639.00
12/27/2023	\$284.00	\$284.00
12/28/2023	\$175.00	\$70.00 (time of .2)
12/29/2023	\$1,136.00	\$781.00 (time of 1.1)

¹ These time entries have to do with responding to discovery sought from the Chamber.

12/29/2023	\$652.50	\$87.00 (time of .2)
12/30/2023	\$1,365.00	\$1,155.00 (time of 3.3)
1/1/2024	\$75.00	\$37.50 (time of .1)
1/2/2024	\$423.00	\$329.00 (time of .7)
1/2/2024	\$750.00	\$187.50 (time of .5)
1/3/2024	\$900.00	\$450.00 (time of 1.2)
1/4/2024	\$750.00	\$300.00 (time of .8)
1/5/2024	\$1,050.00	\$187.50 (time of .5)
1/7/2024	\$825.00	\$750.00 (time of 2.0)
1/8/2024	\$750.00	\$675.00 (time of 1.8)
1/11/2024	\$1,875.00	\$187.50 (time of .5)
1/11/2024	\$384.00	\$320.00 (time of 1.0)
1/12/2024	\$862.50	\$675.00 (time of 1.8)
1/12/2024	\$4,779.00	\$3,321.00 (time of 4.1)
1/13/2024	\$37.50	\$37.50
1/14/2024	\$75.00	\$75.00
1/14/2024	\$37.50	\$37.50
1/14/2024	\$486.00	\$486.00
1/16/2024	\$750.00	\$750.00
1/19/2024	\$37.50	\$37.50
2/5/2024	\$37.50	\$0.00 ²
2/5/2024	\$324.00	\$324.00
2/6/2024	\$825.00	\$150.00 (time of .4)
2/6/2024	\$486.00	\$486.00
2/6/2024	\$188.00	\$188.00
2/12/2024	\$344.00	\$344.00
2/7/2024	\$1,425.00	\$937.50 (time of 2.5)
2/7/2024	\$47.00	\$47.00
2/8/2024	\$37.50	\$0.00 ³
2/12/2024	\$752.00	\$752.00
2/12/2024	\$637.50	\$525.00 (time of 1.4)
2/12/2024	\$972.00	\$972.00
2/13/2024	\$600.00	\$729.00 (time of .9)
2/13/2024	\$188.00	\$188.00
2/13/2024	\$324.00	\$324.00
2/14/2024	\$423.00	\$329.00 (time of .7)
2/14/2024	\$2,187.00	\$2,187.00

² Sending clients the deposition transcript of a non-party is related to the litigation generally.

³ This time entry is regarding the Chamber's deposition transcript and confidential designations.

2/14/2024	\$787.50	\$600.00 (time of 1.6)
2/15/2024	\$1,612.50	\$937.50 (time of 2.5)
2/15/2024	\$141.00	\$141.00
2/16/2024	\$160.00	\$160.00
2/16/2024	\$487.50	\$487.50
2/16/2024	\$141.00	\$141.00
2/19/2024	\$1,457.00	\$1,457.00
2/19/2024	\$1,462.50	\$1,050.00 (time of 2.8)
2/19/2024	\$160.00	\$160.00
5/14/2024	\$637.50	\$637.50
6/6/2024	\$192.00	\$192.00
6/25/2024	\$278.00	\$0.00 ⁴
8/22/2024	\$430.00	\$430.00
8/22/2024	\$450.00	\$75.00 (time of .2)
8/23/2024	\$37.50	\$37.50
8/28/2024	\$258.00	\$258.00
Total	\$58,992.00	\$35,010.50

3. I have reviewed the time entries identified by State Defendants that include redactions of any amount. Based on that review, I have provided the amount of time attributable to the redacted part of the time entry in the third column below:

Entry Date	State Defendant's Suggested Reduction of Redacted Entries	The Chamber's Identification of Entries Redacted
5/1/2023	\$852.00	\$426.00 (time of .6)
6/1/2023	\$1,000.50	\$348.00 (time of .8)
6/3/2023	\$1,278.00	\$284.00 (time of .4)
6/6/2023	\$105.00	\$35.00 (time of .1)
6/19/2023	\$304.50	\$87.00 (time of .2)
6/28/2023	\$2,001.00	\$416.87 (time of 1.0)
6/28/2023	\$1,575.00	\$130.50 (time of .3)
7/3/2023	\$1,207.00	\$284.00 (time of .4)
7/5/2023	\$455.00	\$175.00 (time of .5)
7/5/2023	\$426.00	\$142.00 (time of .2)
7/6/2023	\$348.00	\$261.00 (time of .6)
7/6/2023	\$1,704.00	\$142.00 (time of .2)
7/9/2023	\$175.00	\$175.00

⁴ There is no time entry on this date for this amount.

7/14/2023	\$2,059.00	\$2,059.00
7/14/2023	\$852.00	\$852.00
7/20/2023	\$522.00	\$130.50 (time of .3)
7/24/2023	\$913.50	\$522.00 (time of 1.2)
7/25/2023	\$87.00	\$87.00
8/8/2023	\$43.50	\$43.50
8/14/2023	\$1,207.00	\$284.00 (time of .4)
8/15/2023	\$426.00	\$284.00 (time of .4)
8/28/2023	\$1,610.00	\$280.00 (time of .8)
8/29/2023	\$217.50	\$87.00 (time of .2)
8/30/2023	\$2,800.00	\$420.00 (time of 1.2)
9/21/2023	\$87.00	\$43.50 (time of .1)
10/4/2023	\$609.00	\$87.00 (time of .2)
10/5/2023	\$565.50	\$130.50 (time of .3)
10/6/2023	\$130.50	\$87.00 (time of .2)
10/9/2023	\$639.00	\$130.50 (time of .3)
10/9/2023	\$2,131.50	\$522.00 (time of 1.2)
10/30/2023	\$1,174.50	\$348.00 (time of .8)
10/31/2023	\$1,000.50	\$174.00 (time of .4)
11/9/2023	\$315.00	\$315.00
11/13/2023	\$217.50	\$87.00 (time of .2)
11/13/2023	\$630.00	\$175.00 (time of .5)
11/30/2023	\$670.00	\$234.50.00 (time of .7)
12/4/2023	\$268.00	\$201.00 (time of .6)
12/6/2023	\$1,775.50	\$703.50 (time of 2.1)
12/7/2023	\$904.50	\$167.50 (time of .5)
12/17/2023	\$1,261.50	\$130.50 (time of .3)
12/19/2023	\$1,348.50	\$174.00 (time of .4)
12/27/2023	\$315.00	\$87.00 (time of .2)
1/3/2024	\$1,128.00	\$188.00 (time of .4)
1/3/2024	\$1,377.00	\$243.00 (time of .3)
2/5/2024	\$750.00	\$300.00 (time of .8)
3/25/2024	\$900.00	\$300.00 (time of .8)
5/1/2024	\$141.00	\$47.00 (time of .1)
5/30/2024	\$937.50	\$375.00 (time of 1.0)
5/30/2024	\$517.00	\$470.00 (time of 1.0)
6/3/2024	\$740.00	\$740.00
6/5/2024	\$420.00	\$200.00 (time of 1.0)
6/6/2024	\$340.00	\$200.00 (time of 1.0)
6/7/2024	\$220.00	\$160.00 (time of .8)
6/10/2024	\$56.00	\$56.00
6/19/2024	\$1,377.00	\$648.00 (time of .8)

7/2/2024	\$799.00	\$423.00 (time of .8)
7/10/2024	\$324.00	\$324.00
7/16/2024	\$3,402.00	\$972.00 (time of 1.2)
7/16/2024	\$94.00	\$47.00 (time of .1)
7/17/2024	\$1,081.00	\$94.00 (time of .2)
8/17/2024	\$2,592.00	\$486.00 (time of .6)
8/18/2024	\$972.00	\$324.00 (time of .4)
9/3/2024	\$1,927.00	\$705.00 (time of 1.5)
9/3/2024	\$2,187.00	\$658.00 (time of 1.4)
9/5/2024	\$347.50	\$347.50
Total	\$58,840.50	\$19,825.87

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 17, 2025, in Hennepin County, Minnesota

Dated: March 17, 2025

s/Cianna G. Halloran
Cianna G. Halloran

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